

ESTTA Tracking number: **ESTTA688836**Filing date: **08/11/2015**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Intel Corporation
Granted to Date of previous extension	08/12/2015
Address	2200 Mission College Blvd Santa Clara, CA 95052 UNITED STATES
Attorney information	Ian K. Boyd Harvey Siskind LLP 4 Embarcadero Center, 39th Floor San Francisco, CA 94111 UNITED STATES iboyd@harveysiskind.com, dthompson@harveysiskind.com, clee@harveysiskind.com Phone:415-354-0100

Applicant Information

Application No	86429209	Publication date	04/14/2015
Opposition Filing Date	08/11/2015	Opposition Period Ends	08/12/2015
Applicant	Adams, Sarah 14610 Bournemouth Road Tampa, FL 33626 UNITED STATES		

Goods/Services Affected by Opposition

Class 045. First Use: 0 First Use In Commerce: 0

All goods and services in the class are opposed, namely: Background investigation and research services; detective investigations; DMV record investigation services; litigation support consultancy; legal document analysis services for attorneys; personal background investigations; private investigation; Public record investigation services; Security threat analysis for protecting public safety; Security due diligence services for individuals, businesses, and governments; Security services, namely, providing security assessments for businesses and governmental agencies

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)

Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	938772	Application Date	02/19/1971
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Registration Date	07/25/1972	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1971/01/15 First Use In Commerce: 1971/01/15 EQUIPMENT FOR THE TESTING AND PROGRAMMING OF INTEGRATED CIRCUITS, REGISTERS AND SEMICONDUCTOR MEMORIES		

U.S. Registration No.	939641	Application Date	02/19/1971
Registration Date	08/01/1972	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1969/03/11 First Use In Commerce: 1969/03/11 INTEGRATED CIRCUITS, REGISTERS AND SEMICONDUCTOR MEMORIES		

U.S. Registration No.	1022563	Application Date	10/21/1974
Registration Date	10/14/1975	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1971/07/06 First Use In Commerce: 1971/07/06 MICROCOMPUTERS, MICROCONTROLLERS AND MICROPROCESSORS		

U.S. Registration No.	1723243	Application Date	11/25/1991
Registration Date	10/13/1992	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 006. First use: First Use: 1990/10/16 First Use In Commerce: 1990/10/16 metal key rings Class 014. First use: First Use: 1990/10/15 First Use In Commerce: 1990/10/15 [watches] Class 016. First use: First Use: 1990/10/22 First Use In Commerce: 1990/10/22 note paper, note cards, posters, [microprocessor chip die plot prints as art prints,] pencils, ball point pens, ink pens and stationery folders Class 020. First use: First Use: 1990/10/19 First Use In Commerce: 1990/10/19 plastic key chain tags		

	Class 021. First use: First Use: 1990/10/01 First Use In Commerce: 1990/10/01 mugs and water bottles sold empty Class 028. First use: First Use: 1990/09/27 First Use In Commerce: 1990/09/27 jigsaw puzzles, golf balls, golf tees and golf ball markers
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U.S. Registration No.	1725692	Application Date	11/25/1991
Registration Date	10/20/1992	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1990/10/12 First Use In Commerce: 1990/10/12 all purpose sport bags, gym bags and carry-on bags Class 024. First use: First Use: 1990/10/27 First Use In Commerce: 1990/10/27 towels Class 025. First use: First Use: 1990/10/01 First Use In Commerce: 1990/10/01 clothing; namely, T-shirts, [coveralls], shirts and caps		

U.S. Registration No.	2171778	Application Date	09/04/1996
Registration Date	07/07/1998	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1971/07/06 First Use In Commerce: 1971/07/06 computer operating system software; computer operating programs; computer system extensions, tools and utilities in the field of application software for connecting personal computers, networks, telecommunications apparatus and global computer network applications; audio and video graphics for real time information and image transfer, transmission, reception, processing and digitizing; computer firmware; computer hardware; computer peripherals; integrated circuits; integrated circuit chips; semiconductor processors; semiconductor processor chips; microprocessors; printed circuit boards; electronic circuit boards; computer memory devices; semiconductor memory devices; video circuit boards; audio circuit boards; audio-video circuit boards; video graphic accelerators; multimedia accelerators; video processors; [fax/modems;] computer hardware and software for the transmission and receipt of facsimiles; computer hardware and software for the development, maintenance, and use of local and wide area computer networks; [computer hardware and software for the development, maintenance, and use of interactive audio-video computer conference systems;] computer hardware and software for the receipt, display, and use of broadcast video, audio, and digital data signals		

U.S. Registration No.	2194121	Application Date	09/04/1996
Registration Date	10/06/1998	Foreign Priority Date	NONE
Word Mark	INTEL		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 016. First use: First Use: 1969/03/00 First Use In Commerce: 1969/03/00 printed materials, namely, books, magazines, newsletters, journals, operating manuals, users guides, pamphlets, and brochures about, for use with and directed to users of, computer operating system software; computer operating programs; [computer system extensions; computer system tools]; computer system utilities; computer application software; computer firmware; computer hardware; [computer peripherals]; computer components; integrated circuits; integrated circuit chips; semiconductor processors; semiconductor processor chips; microprocessors; printedcircuit boards; electronic circuit boards; computer memory devices; semiconductor memory devices; video circuit boards;audio circuit boards; audio-video circuit boards; video graphic accelerators;[multimedia accelerators; video processors; fax/modems; computer hardware and software for the transmission and receipt of facsimiles]; computer hardware and software for the development, maintenance, and use of local and wide area computer networks; [computer hardware and software for the development, maintenance, anduse of interactive audio-video computerconference systems;] computer hardware and software for the receipt, display, and use of broadcast video, audio, and digital data signals; and computer hardware and software for development, testing,programming, and production of hardwareand software

U.S. Registration No.	2251962	Application Date	10/10/1997
Registration Date	06/08/1999	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1990/10/00 First Use In Commerce: 1990/10/19 clocks, [belt buckles,] jewelry, [charms,] [cuff links,] [earrings,] key chains, necklaces, [bracelets,] [necktie fasteners, lapel pins,] [money clip,] [pendants, piggy banks,] [tie pins,] trophies and watches		

U.S. Registration No.	2251961	Application Date	10/10/1997
Registration Date	06/08/1999	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1990/10/00 First Use In Commerce: 1990/10/00 binders, [bookends,] boxes for pens, [calendars,] tablets, note cards and playing cards, self-adhesive pads, desk pads, [and calendar pads,] pens, pencils,folders, paperweights, pen and pencil holders, photograph stands, rulers, erasers, markers, desk sets, desk organizers		

U.S. Registration No.	2250491	Application Date	10/10/1997
Registration Date	06/01/1999	Foreign Priority	NONE

		Date	
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1993/10/00 First Use In Commerce: 1993/10/00 Travel bags, luggage, school bags, backpacks, beach bags, duffel bags, [fannypacks,] umbrellas		

U.S. Registration No.	2254525	Application Date	10/10/1997
Registration Date	06/15/1999	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1990/10/00 First Use In Commerce: 1990/10/00 T-shirts, shirts, [beachwear, loungewear, sweaters, sweatshirts, sweat suits, coveralls], jackets,[ties] headwear, [cardigans, gym suits] hats, [jogging suits, necktie], polo shirts, [scarves infantrompers]		

U.S. Registration No.	2261531	Application Date	09/02/1997
Registration Date	07/13/1999	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1990/09/00 First Use In Commerce: 1990/09/00 toys, namely, stuffed toys, toys, plushtoy, dolls, bean bags, [games, namely, board games, stand alone video games, and Christmas tree ornaments]		

U.S. Registration No.	2276580	Application Date	10/10/1997
Registration Date	09/07/1999	Foreign Priority Date	NONE
Word Mark	INTEL		

Design Mark	INTEL
Description of Mark	NONE
Goods/Services	Class 021. First use: First Use: 1993/12/00 First Use In Commerce: 1993/12/00 Mugs, sports bottles

U.S. Registration No.	2446693	Application Date	12/31/1997
Registration Date	04/24/2001	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1971/07/00 First Use In Commerce: 1971/07/00 computers; computer hardware; software for use in operating and maintaining computer systems; semiconductors; microprocessors; integrated circuits; micro-computers; computer chipsets; computer motherboards and daughterboards; computer graphics boards; computer networking hardware; computer network adaptors, switches, routers and hubs; [computer peripherals and electronic apparatus for use with computers; keyboards;] trackballs; [computer mouse devices; computer input devices; computer monitors;] video apparatus; video circuit boards; apparatus and equipment for recording, processing, receiving, reproducing, transmitting, modifying, compressing, decompressing, broadcasting, merging and/or enhancing sound, video images, graphics, and data; algorithm software programs for the operation and control of computers; computer component testing and calibrating electronic units; set-top boxes, namely, electronic control boxes for the interface and control of computer and global computer networks with television and cable broadcast equipment, teleconferencing equipment, and video conferencing equipment, computer programs for network management; computer utility programs; computer operating system software; computer programs for recording, processing, receiving reproducing, transmitting, modifying, compressing, decompressing, broadcasting, merging, and/or enhancing sound, video, images, graphics, and data; [computer programs for web page design;] computer programs for accessing and using the global computer network; telecommunications apparatus and instruments; [apparatus and equipment for use in video-conferencing, teleconferencing, document exchange and editing; cameras and digital cameras for use with computers; headsets for use with computers, computer software, teleconferencing equipment and video conferencing equipment;] parts, fittings, and testing apparatus for all the aforesaid goods; and user manuals for use with, and sold as a unit with, all the aforesaid goods		


U.S. Registration No.	2462327	Application Date	12/18/1998
Registration Date	06/19/2001	Foreign Priority Date	NONE
Word Mark	INTEL		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 1991/12/01 First Use In Commerce: 1991/12/01 [photographic equipment, namely, digital cameras and PC cameras;] computer hardware for use in imaging and photographic applications; computer software for use in imaging and photographic applications, namely, organizing and manipulating images and capturing, retrieving, storing and mailing images via interconnected computer networks; [photo discs, namely, CD Roms for use in storing photographic images; CD Roms for imaging and photographic applications, namely, organizing and manipulating images and capturing, retrieving, storing and mailing images via interconnected computer networks; imaging sensors; interactive multimedia computer game programs; interactive video game programs; interactive video games of virtual reality comprised of computer hardware and software]

U.S. Registration No.	2585551	Application Date	09/10/1996
Registration Date	06/25/2002	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 037. First use: First Use: 2000/02/00 First Use In Commerce: 2000/02/00 computer hardware installation and repair services; maintenance of hardware for local and wide area computer networks; [maintenance of hardware for interactive audio-video computer conference systems;] maintenance for hardware for receipt, display and use of broadcast video, audio, and digital data signals; maintenance of hardware for interactive and non-interactive web pages for the global computer network for others</p> <p>Class 041. First use: First Use: 1997/07/00 First Use In Commerce: 1997/07/00 education [and entertainment] services, namely, arranging and conducting educational conferences and seminars in the fields of computers, telecommunications, and computer networking, and distributing course materials in connection therewith; development, publishing and dissemination of educational materials in the fields of computers, telecommunications and computer networking for others; interactive and non-interactive computer education training services; providing information via global computer network in the fields of education [and entertainment] ; provision of interactive and non-interactive electronic information services in the fields of education [and entertainment]</p> <p>Class 042. First use: First Use: 1999/09/28 First Use In Commerce: 1999/09/28 computer services, namely, computer diagnostic services; maintenance and updating of computer software; providing others with access to interactive and non-interactive broadcast video, audio and digital data signals; provision of interactive and non-interactive electronic information services on a wide variety of topics; development of local and wide area computer networks for others; [development of audio-video computer conference systems for others;] development of computer hardware and software for the receipt, display and use of broadcast video, audio, and digital data signals for others; [leasing access time to computer data bases in the nature of computer bulletin boards in a wide variety of fields; computer web site design services;] computer software design for others; [development of interactive and non-interactive web pages for the global computer network for others;] computer programming services; providing on-line newspapers, magazines, instructional manuals in the fields of technology, [en-</p>		

	tertainment,] education and business; development, maintenance, and provision of interactive and non-interactive electronic bulletin boards services in the fields of [entertainment and] education
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U.S. Registration No.	2742174	Application Date	12/31/1997
Registration Date	07/29/2003	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 042. First use: First Use: 1996/11/00 First Use In Commerce: 1996/11/00 computer-related and communications-related services, namely, [installation,]repair, maintenance, support and consulting services for computer-related and communications-related goods; providing information in the field of computer technology via the global computer network; providing on-line publications, namely, books, brochures, white papers, catalogsand pamphlets in the fields of computerand information technology; designing and developing standards for others in the design and implementation of computer software, computer hardware and telecommunications equipment		


U.S. Registration No.	3029954	Application Date	04/03/2000
Registration Date	12/13/2005	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 1997/05/31 First Use In Commerce: 1997/05/31 [Semiconductor and microprocessor cartridges;] internet and web servers; internet and web caching servers; wireless andremote computer peripherals; computer hardware and software for enabling web portals; computer hardware and software for digital encryption, identification andcertification; computer hardware and software to enable remote encrypted networking; computer hardware and software to enable secure data transmission via networks, the internet and world wide web</p> <p>Class 042. First use: First Use: 2001/04/30 First Use In Commerce: 2001/04/30 [computer consultation services, namely, web design and development services;]Internet and web data services, namely, digital identification and certification-services; application service provider services, namely, hosting computer software applications of others</p>		

U.S. Registration	3136102	Application Date	04/03/2000
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No.			
Registration Date	08/29/2006	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 038. First use: First Use: 2003/03/31 First Use In Commerce: 2003/03/31 Telecommunication services, namely, electronic and digital transmission of data, documents, audio and video via computer terminals		

U.S. Registration No.	3173391	Application Date	05/19/2005
Registration Date	11/21/2006	Foreign Priority Date	NONE
Word Mark	INTEL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 038. First use: First Use: 2001/04/00 First Use In Commerce: 2001/04/00 Telecommunications consulting services		


U.S. Registration No.	4641445	Application Date	11/19/2010
Registration Date	11/18/2014	Foreign Priority Date	NONE
Word Mark	INTEL		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 044. First use: First Use: 2013/09/03 First Use In Commerce: 2013/09/03 INTERACTIVE MONITORING, TRANSMISSION, AND ALERT SERVICES FOR NOTIFYING CAREGIVERS OF A PATIENT'S PHYSICAL STATUS AND VITAL STATISTICS FOR MEDICAL PURPOSES Class 045. First use: First Use: 2013/09/03 First Use In Commerce: 2013/09/03 ELECTRONIC MONITORING SERVICES FOR SECURITY PURPOSES IN THE FIELD OF MONITORING OF INDIVIDUALS, PRIMARILY THE ELDERLY, AT HOME

U.S. Registration No.	1705796	Application Date	04/22/1991
Registration Date	08/04/1992	Foreign Priority Date	NONE
Word Mark	INTEL INSIDE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1992/01/00 First Use In Commerce: 1992/01/00 microprocessors		

U.S. Registration No.	2179209	Application Date	09/04/1996
Registration Date	08/04/1998	Foreign Priority Date	NONE
Word Mark	INTEL INSIDE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1992/01/00 First Use In Commerce: 1992/01/00 computer operating system software; computer operating programs; computer system[extensions, tools and] utilities in the field of application software for connecting personal computers, networks, telecommunications apparatus and global computer network applications; [audio and video graphics for real time information and image transfer, transmission, reception, processing and digitizing;] computer firmware; computer hardware; [computer peripherals;] integrated circuits; integrated circuit chips; semiconductor processors; semiconductor processor chips; microprocessors; printed circuit boards; electronic circuit boards; computer memory devices; semiconductor memory devices; video circuit boards; audio circuit boards; audio-video circuit boards; [video graphic accelerators; multimedia accelerators; video processors; fax/modems; computer hard-		

	ware and software for the transmission and receipt of facsimiles;] computer hardware and software for the development, maintenance, and use of local and wide area computer networks; computer hardware and software for the development, maintenance, and use of interactive audio-video computer conference systems; computer hardware and software for the receipt, display, and use of broadcast video, audio, and digital data signals
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U.S. Registration No.	3795049	Application Date	12/22/2005
Registration Date	05/25/2010	Foreign Priority Date	NONE
Word Mark	INTEL INSIDE		
Design Mark			
Description of Mark	The mark consists of the term "INTEL" inside two elliptical arcs that do not connect but create a three dimensional swirl element, and the word "INSIDE" placed below and slightly to the right of center.		
Goods/Services	Class 009. First use: First Use: 2007/01/00 First Use In Commerce: 2007/01/00 Computers; notebook computers; laptop computers; portable computers; computer hardware; semiconductors; microprocessors; integrated circuits; central processing units; microcomputers; computer chipsets; computer motherboards; computer graphics boards		

U.S. Registration No.	3349705	Application Date	09/15/2005
Registration Date	12/04/2007	Foreign Priority Date	NONE
Word Mark	INTEL CORE		


Design Mark	INTEL CORE
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 2005/11/00 First Use In Commerce: 2005/11/00 Data processors; computers; semiconductors; microprocessors; semiconductor devices; integrated circuits; computer chipsets; computer motherboards and daughterboards; computer software, namely, [computer operating systems,]computer utilitysoftware and other computer software used to maintain and operate a computer system; programmable data processors

U.S. Registration No.	3532588	Application Date	04/23/2006
Registration Date	11/11/2008	Foreign Priority Date	NONE
Word Mark	INTEL VPRO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2006/04/24 First Use In Commerce: 2006/04/24 Computers; desktop computers; laptop computers; notebook computers; semi-conductors; microprocessors; integrated circuits; computer chipsets; computer hardware and software for computer networking and telecommunications networking; computer hardware and software for providing and enhancing the overall management of computer applications and operating systems as well as the dia-		

	gnosis, maintenance, allocation of computer resources, inventory and upgrade of computer hardware, computer software and computer networks; computer hardware and software for providing and enhancing connectivity between computers, computer networks, and telecommunications networks; computer hardware and software for providing and enhancing the sharing, transfer and presentation of audio, video and data; computer hardware and software for monitoring, repairing and upgrading computers, computer networks and computer software; computer hardware and software for providing and enhancing data protection, data back-up, data restoration and security of computers, computer networks and computer software; computer hardware and software for enabling automatic transitioning between levels of voltage and frequency performance of a computer processor and computersystem
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U.S. Registration No.	3580552	Application Date	04/23/2006
Registration Date	02/24/2009	Foreign Priority Date	01/18/2006
Word Mark	INTEL VPRO		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 2006/04/24 First Use In Commerce: 2006/04/24</p> <p>Computers; desktop computers; laptop computers; notebook computers; semiconductors; microprocessors; integrated circuits; computer chipsets; computer hardware and software for computer networking and telecommunications networking; computer hardware and software for providing and enhancing the overall management of computer applications and operating systems as well as the diagnosis, maintenance, allocation of computer resources, inventory and upgrade of computer hardware, computer software and computer networks; computer hardware and software for providing and enhancing connectivity between computers, computer networks, and telecommunications networks; computer hardware and software for providing and enhancing the sharing, transfer and presentation of audio, video and data; computer hardware and software for monitoring, repairing and upgrading computers, computer networks and computer software; computer hardware and software for providing and enhancing data protection, data back-up, data restoration and security of computers, computer networks and computer software; computer hardware and software for enabling automatic transitioning between levels of voltage and frequency performance of a computer processor and computersystem; all of the aforementioned software excluding data acquisition software specifically related to industrial, manufacturing, scientific and other applications where physical measurements such as temperature, weight, level, velocity, voltage, current and frequency are converted to an electrical signal</p>		

U.S. Registration No.	3928879	Application Date	02/26/2008
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Registration Date	03/08/2011	Foreign Priority Date	11/16/2007
Word Mark	INTEL ATOM		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2008/03/00 First Use In Commerce: 2008/03/00 Computers; computer hardware; semiconductors; microprocessors; integrated circuits; computer motherboards; software programmable microprocessors; notebook and laptop computers; portable computers; handheld computers; wireless devices used for internet connectivity featuring data and image transmission		

U.S. Registration No.	4130118	Application Date	08/18/2008
Registration Date	04/24/2012	Foreign Priority Date	07/01/2008
Word Mark	INTEL INTRU		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 0 First Use In Commerce: 0 Entertainment services, namely, production of motion pictures, videos and films; special effects animation services for television, video and motion pictures; animation production services; multimedia entertainment software production services		

U.S. Registration No.	4130117	Application Date	08/18/2008
Registration Date	04/24/2012	Foreign Priority Date	07/01/2008
Word Mark	INTEL INTRU		

Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 009. First use: First Use: 0 First Use In Commerce: 0</p> <p>Computer software for creating 3D animation; 3D animation process technology software for creation, production, recording, transmission or reproduction of sound, video, movies, films, animated content, graphics and images; computer software for use in relation to digital animation and special effects of images; software for processing images, graphics and text; software to control and improve computer and audio equipment sound quality; computer game software; computer graphics software; electronic game software; game software; video game software; virtual reality game software; interactive video games comprised of computer hardware and software; computers; computer servers; computer work stations comprising microprocessors, central processing units, computer monitors, computer memories and computer memory hardware, computer disk drives, computer chipsets, motherboards and computer peripherals; computer hardware, computer motherboards, integrated circuits, semiconductors and microprocessors; video game cartridges; computer software for playing video games and computer games with others via a global computer or communication network; computer software for compressing and decompressing data and video images; notebook and laptop computers; portable computers; handheld computers; tablet computers; ultramobile computers; computer software for use in providing multiple user access to a global computer information network; computer firmware, namely, computer operating system software, computer utility software; portable video players; hand-held units for playing electronic games for use with external display screen or monitor</p>

U.S. Registration No.	4277312	Application Date	04/19/2012
Registration Date	01/15/2013	Foreign Priority Date	NONE
Word Mark	INTEL COFLUENT		
Design Mark			
Description of Mark	NONE		

Goods/Services	Class 009. First use: First Use: 2012/06/02 First Use In Commerce: 2012/06/02 Computer software tools for simulation,modeling, analyzing, validating, and design of computer systems and system architecture
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Attachments	75349837#TMSN.png(bytes) 75371362#TMSN.png(bytes) 76975693#TMSN.png(bytes) 76016892#TMSN.png(bytes) 78633311#TMSN.png(bytes) 85181390#TMSN.png(bytes) 78779403#TMSN.png(bytes) 78714166#TMSN.png(bytes) 78867552#TMSN.png(bytes) 78867548#TMSN.png(bytes) 77406712#TMSN.png(bytes) 77549890#TMSN.png(bytes) 77549885#TMSN.png(bytes) 85603213#TMSN.png(bytes) Notice of Opposition.150811 (00061939xA1ADA).pdf(199316 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Ian K. Boyd/
Name	Ian K. Boyd
Date	08/11/2015

1 HARVEY SISKIND LLP
2 IAN K. BOYD (CA SBN 191434)
3 iboyd@harveysiskind.com
4 DONALD A. THOMPSON (CA SBN 260076)
5 dthompson@harveysiskind.com
6 Four Embarcadero Center, 39th Floor
7 San Francisco, CA 94111
8 Telephone: (415) 354-0100
9 Facsimile: (415) 391-7124

10 Attorneys for Opposer,
11 Intel Corporation

12 **IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**
13 **BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

14 INTEL CORPORATION, a Delaware
15 corporation,

16 Opposer,

17 v.

18 SARAH ADAMS, an individual,

19 Applicant.

20 **NOTICE OF OPPOSITION**

21 Opposition No.

22 App. Serial No. 86429209

23 Mark: INTELCHASE

24 Intel Corporation, a Delaware corporation, having its principal place of business at 2200
25 Mission College Boulevard, Santa Clara, California 95052 (“Intel” or “Opposer”), believes that it will
26 be damaged by registration of the mark INTELCHASE shown in Application Serial No. 86429209 (the
27 “Opposed Mark” shown in the “Opposed Application”). Sarah Adams, an individual resident of Tampa,
28 Florida (“Applicant”), filed the Opposed Application, which Intel hereby opposes.

As grounds for opposition, Intel alleges:

DESCRIPTION OF THE OPPOSED APPLICATION

1. Applicant filed the Opposed Application on October 20, 2014, and it published for
opposition in the Official Gazette on April 14, 2015.

2. The Opposed Application seeks registration of the Opposed Mark in International Class 45 for “Background investigation and research services; detective investigations; DMV record investigation services; litigation support consultancy; legal document analysis services for attorneys; personal background investigations; private investigation; Public record investigation services; Security threat analysis for protecting public safety; Security due diligence services for individuals, businesses, and governments; Security services, namely, providing security assessments for businesses and governmental agencies.”

3. On April 15, 2015, Opposer requested, and the Trademark Trial and Appeal Board (the “Board”) granted, one 90-day extension of time to oppose the Opposed Application.

OPPOSER’S FAMILY OF TRADEMARKS

4. Opposer is a world-famous company that develops, manufactures, and sells a wide variety of technology-related goods and services.

5. Opposer’s goods and services are sold throughout the United States under its company name and house mark INTEL, as well as under numerous trademarks that incorporate INTEL as a prominent component of the mark.

6. Opposer has continuously sold goods and offered services since at least as early as 1968 under the company name and house mark INTEL, long prior to the filing date of the Opposed Application or use of the Opposed Mark by Applicant.

7. Opposer is the owner of record of numerous trademark registrations in the U.S. Patent and Trademark Office covering its INTEL mark, either with INTEL standing alone or as part of a composite mark, for a variety of computer software and hardware products, semiconductors, microprocessors, and related goods and services. These registrations include:

<u>MARK</u>	<u>REG. NO.</u>	<u>REG. DATE</u>	<u>CLASS(ES)</u>
INTEL	938,772	7/25/72	Class 9
INTEL	939,641	8/1/72	Class 9
INTEL	1,022,563	10/14/75	Class 9
INTEL	1,723,243	10/13/92	Classes 6, 14, 16, 20, 21, 28

<u>MARK</u>	<u>REG. NO.</u>	<u>REG. DATE</u>	<u>CLASS(ES)</u>
INTEL	1,725,692	10/20/92	Classes 18, 24, 25
INTEL	2,171,778	7/7/98	Class 9
INTEL	2,194,121	10/6/98	Class 16
INTEL	2,251,962	6/8/99	Class 14
INTEL	2,251,961	6/8/99	Class 16
INTEL	2,250,491	6/1/99	Class 18
INTEL	2,254,525	6/15/99	Class 25
INTEL	2,261,531	7/13/99	Class 28
INTEL	2,276,580	9/7/99	Class 21
INTEL	2,446,693	4/24/01	Class 9
INTEL	2,462,327	6/19/01	Class 9
INTEL	2,585,551	6/25/02	Classes 37, 41 and 42
INTEL	2,742,174	7/29/03	Class 42
INTEL	3,029,954	12/21/06	Class 9 & 42
INTEL	3,136,102	8/29/06	Class 38
INTEL	3,173,391	11/21/06	Class 38
INTEL	4,641,445	11/18/14	Classes 44 and 45
INTEL INSIDE	1,705,796	8/4/92	Class 9
INTEL INSIDE	2,179,209	8/4/98	Class 9
INTEL INSIDE	3,795,049	5/25/10	Class 9
INTEL CORE	3,349,705	12/4/07	Class 9
INTEL VPRO	3,532,588	11/11/08	Class 9
INTEL VPRO	3,580,552	2/24/09	Class 9

<u>MARK</u>	<u>REG. NO.</u>	<u>REG. DATE</u>	<u>CLASS(ES)</u>
INTEL ATOM	3,928,879	3/8/11	Class 9
INTEL INTRU	4,130,118	4/24/12	Class 41
INTEL INTRU	4,130,117	4/24/12	Class 9
INTEL COFLUENT	4,277,312	1/15/2013	Class 9

8. Each of the above registrations is currently valid and subsisting. Further, many of these registrations are now incontestable under the provisions of 15 U.S.C. § 1065.

9. Through its extensive use and promotion, Opposer also owns common law trademark rights in the INTEL name and mark, either with INTEL standing alone or as part of a composite mark, for all of the goods and services and activities identified herein. For example, Opposer has extensively used and promoted the mark INTEL SECURITY in connection with solutions that secure computers, mobile devices, and networks. Such solutions protect valuable intellectual property, data, devices, and identities.

10. Opposer has invested tens of billions of dollars in advertising and promotion of goods sold and services offered under its INTEL name and mark.

11. Opposer's extensive investment and efforts in promoting the name and house mark INTEL for Opposer's full range of goods and services has made INTEL a famous mark. From 1993 to the present, INTEL has been regularly named one of the world's "most valuable brands" by Financial World Magazine and Interbrand Market Research Company. In 2014, the INTEL brand was ranked twelfth in Interbrand's "The Best Global Brands" report with an estimated value of over \$34 billion.

LIKELIHOOD OF CONFUSION

12. The Opposed Application seeks registration of the Opposed Mark in International Class 45 for "Background investigation and research services; detective investigations; DMV record investigation services; litigation support consultancy; legal document analysis services for attorneys; personal background investigations; private investigation; Public record investigation services; Security threat analysis for protecting public safety; Security due diligence services for individuals,

1 businesses, and governments; Security services, namely, providing security assessments for
2 businesses and governmental agencies.”

3 13. These services are highly related to goods and services offered by Opposer. For
4 example, “security threat analysis for protecting public safety,” as identified in the Opposed
5 Application, is highly related to “electronic monitoring services for security purposes in the field of
6 monitoring of individuals, primarily the elderly, at home,” as identified in Opposer’s U.S. Reg. No.
7 4,641,445. Likewise, “providing security assessments for businesses and governmental agencies,”
8 as identified in the Opposed Application, is highly related to solutions for securing computers,
9 mobile devices, and networks offered under Opposer’s INTEL SECURITY mark.

10 14. Moreover, the marks at issue are extremely similar. Applicant’s mark wholly
11 incorporates Opposer’s famous and distinctive INTEL mark, followed by the common and
12 descriptive word “chase,” which does nothing to obviate a likelihood of confusion. Indeed,
13 Applicant’s mark appears to belong to Opposer’s INTEL family of marks.

14 15. Given the relevant customer association between Opposer’s INTEL brand and its
15 leadership in relevant fields, confusion is likely. Namely, when relevant customers see the parties’
16 marks in the marketplace, they are likely to draw the false conclusion that Applicant’s services are
17 affiliated with or sponsored by Opposer.

18 16. The Opposed Mark should be denied registration because its use as a source identifier
19 is likely to cause confusion with Opposer’s famous INTEL marks as to the source, sponsorship, or
20 affiliation of Applicant’s services. On the contrary, Opposer is neither affiliated with nor a sponsor
21 of Applicant, and the services identified by the Opposed Mark do not originate from Opposer.

22 17. Registration of the Opposed Mark would be inconsistent with Opposer’s established
23 trademark rights under the aforementioned registrations and common law, and would damage
24 Opposer.

25 **DILUTION**

26 18. Opposer’s INTEL mark is distinctive and famous among the general consuming
27 public of the United States.

19. Opposer's INTEL mark became distinctive and famous before Applicant filed the Opposed Application or used the Opposed Mark.

20. On information and belief, Applicant's use of the Opposed Mark has caused, and is likely to continue to cause, dilution of the distinctive quality of Opposer's famous INTEL mark.

21. Registration of the Opposed Mark would be inconsistent with Opposer's established trademark rights under the aforementioned registrations and common law, and would damage Opposer.

PRA YER

WHEREFORE, Opposer prays that Application Serial No. 86429209 be rejected, no registration thereon be issued to Applicant, and this Opposition be sustained in favor of Opposer. Opposer hereby appoints as its attorneys Harvey Siskind LLP, a law firm composed of members of the Bar of the State of California, with full power to prosecute this Opposition, transact all relevant business with the U.S. Patent and Trademark Office and the United States Courts and receive all official communication in connection with this Opposition.

Dated: August 11, 2015

Respectfully submitted,

HARVEY SISKIND LLP
IAN K. BOYD
DONALD A. THOMPSON

By */Ian K. Boyd/*

Ian K. Boyd

Attorneys for Opposer,
Intel Corporation

CERTIFICATE OF TRANSMISSION

I hereby certify that a true and correct copy of the attached NOTICE OF OPPOSITION
(Serial No. 86429209) is being electronically transmitted to the Trademark Trial and Appeal Board
on August 11, 2015.

/Ian K. Boyd/

Ian K. Boyd

1 **CERTIFICATE OF MAILING**

2 I hereby certify that a true and correct copy of the attached NOTICE OF OPPOSITION
3 (Serial No. 86429209) was served on Applicant via first-class mail on August 11, 2015, postage
4 prepaid, addressed to:

5 Ms. Sarah Adams
6 14610 Bournemouth Road
7 Tampa, FL 33626

8 /Cynthia Lee/
9 Cynthia Lee